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20  
21 UNITED STATES DISTRICT COURT  
22  
23 NORTHERN DISTRICT OF CALIFORNIA

24  
25 DEMETRIC DI-AZ, OWEN DIAZ, and  
26 LAMAR PATTERSON,

27 Plaintiffs,

28 v.

29 TESLA, INC. dba TESLA MOTORS, INC.;  
30 CITISTAFF SOLUTIONS, INC.; WEST  
31 VALLEY STAFFING GROUP;  
32 CHARTWELL STAFFING SERVICES, INC.;  
33 and DOES 1-50, inclusive,

34 Defendants.

35 Case No. 3:17-cv-06748-WHO

36  
37 **SUPPLEMENTAL DECLARATION OF**  
38 **CIMONE NUNLEY IN SUPPORT OF**  
39 **PLAINTIFF'S ADMINISTRATIVE**  
40 **MOTION TO FILE UNDER SEAL**

41 Date: May 11, 2020

42 Time: 10:00 a.m.

43 Courtroom: 2, 17th Floor

44 Judge: Hon. William H. Orrick

45 Trial Date: June 8, 2020

46 Complaint filed: October 16, 2017

1 I, CIMONE A. NUNLEY, hereby declare:

2       1. I am an attorney licensed to practice law in the State of California. I am an  
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for Plaintiff  
4 Owen Diaz in this action. I submit this Supplemental Declaration in support of Plaintiff's  
5 Motions *in Limine* nos. 1 through 6. I have personal knowledge of the facts stated herein and if  
6 called upon to testify, I could and would competently testify thereto, except as to those matters  
7 that are stated upon information and belief.

8       2. Attached hereto and marked as Supplemental Exhibit 1 are true and correct copies  
9 of various excerpts from Volume I of the deposition of Plaintiff Owen Diaz. Defendant Tesla,  
10 Inc. (hereinafter "Defendant") marked this document as "confidential" pursuant to the Protective  
11 Order and the document should therefore be sealed pursuant to this Order.

12       3. Attached hereto and marked as Supplemental Exhibit 2 is a true and correct copy  
13 of a document produced by Defendant in discovery and Bates stamped TESLA-0000004 to  
14 TESLA-0000008. Defendant marked this document as "confidential" pursuant to the Protective  
15 Order and the document should therefore be sealed pursuant to this Order.

16       4. Attached hereto and marked as Supplemental Exhibit 3 is a true and correct copy  
17 of a document produced by Defendant in discovery and Bates stamped TESLA-0000732 to  
18 TESLA-0000734. Defendant marked this document as "confidential" pursuant to the Protective  
19 Order and the document should therefore be sealed pursuant to this Order.

20       5. Attached hereto and marked as Supplemental Exhibit 4 are true and correct copies  
21 of documents produced by former Defendant nextSource, Inc. (hereinafter "nextSource") in  
22 discovery and Bates stamped NS000012 to NS000013. nextSource marked this document as  
23 "confidential" pursuant to the Protective Order and the document should therefore be sealed  
24 pursuant to this Order.

1       6.       Attached hereto and marked as Supplemental Exhibit 5 is a true and correct copy  
2 of a document produced by nextSource in discovery and Bates stamped NS000136 to NS000137.  
3 nextSource marked this document as “confidential” pursuant to the Protective Order and the  
4 document should therefore be sealed pursuant to this Order.

5       7.       Attached hereto and marked as Supplemental Exhibit 6 is a true and correct copy  
6 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000125 to  
7 TESLA-0000130. Defendant marked this document as “confidential” pursuant to the Protective  
8 Order and the document should therefore be sealed pursuant to this Order.

9       8.       Attached hereto and marked as Supplemental Exhibit 7 are true and correct copies  
10 of documents produced by Defendant in discovery and Bates-stamped TESLA-0000702 to  
11 TESLA-0000703. Defendant marked this document as “confidential” pursuant to the Protective  
12 Order and the document should therefore be sealed pursuant to this Order.

13       9.       Attached hereto and marked as Supplemental Exhibit 8 are true and correct copies  
14 of documents produced by Defendant in discovery and Bates-stamped TESLA-0000127 to  
15 TESLA-0000128. Defendant marked this document as “confidential” pursuant to the Protective  
16 Order and the document should therefore be sealed pursuant to this Order.

17       10.       Attached hereto and marked as Supplemental Exhibit 9 is a true and correct copy  
18 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000664.  
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the  
20 document should therefore be sealed pursuant to this Order.

21       11.       Attached hereto and marked as Supplemental Exhibit 10 is a true and correct copy  
22 of a document produced by Defendant in discovery and Bates stamped TESLA-0000319.  
23 Defendant marked this document as “confidential” pursuant to the Protective Order and the  
24 document should therefore be sealed pursuant to this Order.

1       12. Attached hereto and marked as Supplemental Exhibit 11 is a true and correct copy  
2 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000320.  
3 Defendant marked this document as “confidential” pursuant to the Protective Order and the  
4 document should therefore be sealed pursuant to this Order.

5       13. Attached hereto and marked as Supplemental Exhibit 12 is a true and correct copy  
6 of a document produced by Defendant in discovery and Bates-stamped TESLA-0000612.  
7 Defendant marked this document as “confidential” pursuant to the Protective Order and the  
8 document should therefore be sealed pursuant to this Order.

9       14. Attached hereto and marked as Supplemental Exhibit 13 are true and correct  
10 copies of documents produced by Defendant in discovery and Bates-stamped TESLA-0000336  
11 to TESLA0000338. Defendant marked this document as “confidential” pursuant to the Protective  
12 Order and the document should therefore be sealed pursuant to this Order.

13       15. Attached hereto and marked as Supplemental Exhibit 14 are true and correct  
14 copies of documents produced by Defendant in discovery and Bates stamped TESLA-0000505 to  
15 TESLA0000506. Defendant marked this document as “confidential” pursuant to the Protective  
16 Order and the document should therefore be sealed pursuant to this Order.

17       16. Attached hereto and marked as Supplemental Exhibit 15 is a true and correct copy  
18 of a document produced by Defendant in discovery and Bates stamped TESLA-0000557.  
19 Defendant marked this document as “confidential” pursuant to the Protective Order and the  
20 document should therefore be sealed pursuant to this Order.

21       17. Attached hereto and marked as Supplemental Exhibit 16 is a true and correct copy  
22 of a document produced by Defendant in discovery and Bates stamped TESLA-0000704 to  
23 TESLA-0000705. Defendant marked this document as “confidential” pursuant to the Protective  
24 Order and the document should therefore be sealed pursuant to this Order.

1       18. Attached hereto and marked as Supplemental Exhibit 17 are true and correct  
2 copies of documents produced by Defendant in discovery and Bates stamped TESLA-0000708 to  
3 TESLA0000709. Defendant marked this document as “confidential” pursuant to the Protective  
4 Order and the document should therefore be sealed pursuant to this Order.

5       19. Attached hereto and marked as Supplemental Exhibit 18 are true and correct  
6 copies of documents produced by Defendant in discovery and Bates stamped TESLA0000741 to  
7 TESLA-0000743. Defendant marked this document as “confidential” pursuant to the Protective  
8 Order and the document should therefore be sealed pursuant to this Order.

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11       I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct. Executed on April 20, 2020 in Sacramento, California.  
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14  
15

16       DATED: April 20, 2020

17       By: 

18       Lawrence A. Organ, Esq.  
19       Navruz Avloni, Esq.  
20       J. Bernard Alexander, Esq.  
21       Cimone A. Nunley, Esq.  
22       Attorneys for Plaintiff  
23       OWEN DIAZ  
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